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The Honorable Hildy Bowbeer, Magistrate Judge
United States District Court for the District of Minnesota
632 Federal Building
316 North Robert Street
St. Paul, MN 55101

Dear Judge Bowbeer:

In accordance with the Court's Order on January 8, 2015, Defendants Manwin USA, Inc. and Manwin Holding s.a.r.l. and Playboy Enterprises, Inc. hereby submit their position regarding the stipulation of representative sites.

The parties have been negotiating joint stipulations for Manwin and Playboy with the goal of selecting representative sites that can be used to determine liability in this case. The current status of each Defendant's stipulation is slightly different, but both have run into significant complications that make such a stipulation difficult for the parties to agree upon at this stage in the litigation.

The parties have material disagreements about the scope of the asserted claims and these disagreements will not be resolved until the Court issues a claim construction decision. In addition, while Plaintiff has accused Defendants of performing every step in the claims, it is undisputed that third parties are involved in some of the steps. The parties do not know the specific actions performed by third parties and, therefore, cannot stipulate to representative sites for every claimed step.

Respectfully submitted,

/s/Tamany Vinson Bentz

Tamany Vinson Bentz
Counsel for Manwin USA, Inc., Manwin Holding,
S.á.r.l., and Playboy Enterprises, Inc.